

CHIEF EXECUTIVE OFFICER
Lydia J. Valencia

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: WC Docket Nos. 18---143, 10---90 and 14---58; FCC 18---57 **Proposed Rule** by **FCC** on **06/13/2018 ID**: FCC-2018-0212-0002 https://www.fcc.gov/ecfs/filings

Dear Ms. Dortch:

The New Jersey Puerto Rican Congress, Inc., a statewide organization that serves as advocate to Puerto Ricans, both here and on the Island, for well over 45 years has been instrumental in providing aid in the aftermath of the hurricanes. We immediately established the Boricuas From New Jersey Para Puerto Rico Fund and fundraised throughout the state of New Jersey, to be able to assist our beloved Island.

As part of our efforts, we shipped 166 tons of donated goods, (with the assistance of then NI Governor Christie), provided monetary assistance of to the Episcopalian Diocese in Carolina, Puerto Rico to provide water, food delivery and fix roofs for people in the mountain regions, provided financial assistance to an effort in Carolina that was fixing roofs and delivering food and water to people in the Humacao region, provided SIMS (a Federally Qualified Clinic) in Comerio, PR, with a 10 KW Solar printed battery, invertor and solar panels so that they could maintain their medications/immunizations refrigerated even if they power is off. Currently we are sponsoring an elementary school in Comerio, PR, the Escuela Inez M. Mendoza in ensuring that it is energy sustainable, by providing them with (3) 10 KW Solar Printed Batteries and invertor (10) solar panels. We are in the process of also sponsoring two additional schools, the Ramon A. Ayala Elementary School in Comerio, the other in Bayamon that needs replacement of a roof for their special education students. It has been our experience that the lack of communication has hindered the process of identifying persons/families in need, to the point that it is our understanding that the death toll due to the Hurricanes, especially Hurricane Maria, that was catastrophic will result in larger numbers than those released to date. In the fragile state that the current communications and electrical power in the island is, should another climatic event occur, (hopefully never as severe as Hurricane Maria) we need to address these life sustaining services.

As such, we submit these comments for consideration by the Commission regarding the implementation of **Uniendo a Puerto Rico Fund** .

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I support the efforts of the Coalition to Fund CPR (Centros de Preparación y Respuestas).

The Commission has publicly stated it recognizes the need for a longer---term solution to "rebuild, improve and expand service in Puerto Rico and the U.S. Virgin Islands" in the wake of the devastation of communication networks. The Commission proposes to dedicate funding specifically to "fixed and mobile providers" to provide critical "fixed voice and broadband services."

On behalf of the U.S. citizens residing on these islands, I implore you to consider the following! It is undeniable that these islands need and deserve reliable communication systems that can withstand natural disasters and prevent our fellow countryman from ever suffering such devastation again. Therefore, the funds dedicated through the Uniendo a Puerto Rico Fund are well directed. We strongly suggest that the Commission include in the proposed rules for the distribution and implementation of the funds the following:

A.Stage 1 funding was too narrowly focused. It excludes locally based satellite facilities. This hampers economic development in Puerto Rico.

B. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded.

C.Stage 2 and later rounds of funding must be available to new entrants. Especially entrants with satellite facilities in Puerto Rico.

It is also imperative that the FCC understands that any long---term investment in the communications infrastructure of Puerto Rico <u>must</u> include satellite technology. Not only must satellite technology be included, it must be <u>a priority</u> in any restoration funding efforts. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island, especially in rural and mountainous areas, in order to build a truly resilient and connected Puerto Rico. Funding must allow for innovative, independent community based and multi sector telecommunications networks to be established.

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As storms increase in frequency and strength, it is imperative that Puerto Rico rebuild its demolished infrastructure to withstand the next and future hurricane seasons. Terrestrial communication cannot be relied upon, as we have already sadly learned. As you know, 86% of all cell phone towers were put out of service due to the hurricanes. Puerto Rico suffered \$1.5 billion in damages to our communications network – leaving too many stranded and without hope for supplies or assistance. The only system that worked was satellite broadband. In fact, even **FEMA relied on this system and supplied Puerto Ricans with satellite phones.**

Thank you for your dedication to serving the people of Puerto Rico during this difficult time and for your consideration of our remarks. Should you have any questions or wish to speak further, please contact us at 732 364 2600.

Sincerely.

Lydia J Valencia CEO/President

New Jersey Puerto Rican Congress, Inc.

CC: Congressman Chris Smith Congressman Tom MacArthur